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November 18, 2024

Via ECF

Hon. P. Kevin Castel
U.S. District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007

Re: John Doe v. City of New York, et al., 22-cv-2690 (PKC) (KHP)

Dear Judge Castel:

This firm represents Plaintiff John Doe in this case. We submit this letter to supplement Plaintiff's motion to seal (*see* ECF No. 186) with a news article published last week that demonstrates the danger that Plaintiff and his family would face if his identity were made public. The news article, attached hereto as Exhibit A, discusses an ongoing "gang war" in northern Manhattan involving some of the same individuals and events that gave rise to this lawsuit. This article makes clear that the gangs with which these individuals are associated are active and responsible for a great deal of violence in the neighborhoods in which they operate. As discussed in Plaintiff's motion and supporting papers (*see* ECF Nos. 187 & 188), the revelation of Plaintiff's history as a CI would likely cause members of one or more of these gangs to target him for retribution.

Respectfully submitted,

/s
Andrew G. Celli, Jr.
Katherine Rosenfeld
Emily K. Wanger

Encl.

c. All counsel of record, *via ECF*